

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:	:	
	:	
Ayahan H. Hoshan	:	Case No.: 19-14742-mdc
	:	
Debtor(s)	:	Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Ayahan H. Hoshan, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about July 30, 2019.
2. The Chapter 13 filing was assigned case number 19-14742.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about January 29, 2020.
4. On or about February 2020, the Debtor lost his job just prior to the start of the pandemic.
5. The Debtor has since found new employment in the same or similar position; however, it is at a much lower salary than his previous position.
6. As a result of the decrease in income, the Debtor is humbly requesting that the Court allow him to modify his Chapter 13 plan.
7. In furtherance thereof this Motion and Modified Chapter 13 Plan are being contemporaneously filed.
8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", is affordable by the Debtor.

**WHEREFORE**, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: October 20, 2020

/s/Brad J. Sadek, Esq.  
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